

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

KAYLA CATHOLIC,

*Plaintiff,*

v.

AFNI, INC.,

*Defendant.*

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CASE NO. -----

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**DEFENDANT AFNI, INC.’S  
NOTICE OF REMOVAL**

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TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Defendant AFNI, INC. (“AFNI”) and files its Notice of Removal as follows:

1. Plaintiff KAYLA CATHOLIC filed her state court Complaint on May 15, 2023, in the Magistrate Court of Gwinnett County, Georgia, located at 75 Langley Dr, Lawrenceville, Georgia 30046.

2. This is a civil action based on Plaintiff’s contention that the Defendant AFNI violated the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (“FCRA”)

3. Removal is proper because this case involves a federal question—an alleged violation of the FCRA. This entire suit is removable under 28 U.S.C. § 1441(a).

4. Venue is proper in this district under 28 U.S.C. 1441(a) because the state court where the suit has been pending is located in this district.

5. Removal is timely pursuant to 28 U.S.C. § 1441(b) because Defendant has filed its Notice of Removal within 30 days of service of Plaintiff's state court Petition.

7. Pursuant to U.S.C. § 1441(a), a copy of all process, pleadings, documents, and orders in this case have been attached as **Exhibit A**.

8. A copy of this Notice of Removal has been sent to Plaintiff and will be filed with the clerk of the Magistrate Court of Gwinnett County, Georgia.

WHEREFORE, Defendant AFNI, INC. respectfully requests that this Court assume full jurisdiction over the proceeding as provided by law.

This 19<sup>th</sup> day of June, 2022.

Respectfully submitted,

BEDARD LAW GROUP, P.C.

/s/ Michael K. Chapman

Michael K. Chapman

Georgia Bar No. 322145

John H. Bedard, Jr.

Georgia Bar No. 043473

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Afni, Inc.*

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**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1D**

Pursuant to Local Rule 7.1D, the undersigned counsel certifies that this document has been prepared using Times New Roman 14-point font.

This 19<sup>th</sup> day of June, 2023.

Respectfully submitted,

BEDARD LAW GROUP, P.C.

/s/ Michael K. Chapman

Michael K. Chapman

Georgia Bar No. 322145

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served all parties of record with a copy of the foregoing **Notice of Removal** by depositing a copy of same in the United States Mail, with first-class postage affixed thereto, properly addressed as follows:

Kayla Catholic  
2231 Westside Drive  
Austell, Georgia 30106

This 19<sup>th</sup> day of June, 2023.

Respectfully submitted,

BEDARD LAW GROUP, P.C.

/s/ Michael K. Chapman

Michael K. Chapman

Georgia Bar No. 322145